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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN - DIVISION

FILED

AUG 0 5 2008 LOW

MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

Dennis Earl Plummer,)

-vs-)

COUNTY OF COOK ILLI)

NOIS et al.

Case No. <u>D8c3905</u>

Judge: Pallmeyer

MOTION FOR APPOINTMENT OF COUNSEL

Now Comes, the plaintiff Dennis Earl Plummer, Pro se and moves this Honorable Court pursuant to 28 U.S.C. 1915(e)(1). Plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion the plaintiff states the following:

- 1). That he is unable to afford counsel. He has been granted leave to proceed informa pauperis.
- 2). That he is presently incarcerated in the Cook County Department of Corrections. Because of his present incarceration this will greatly hender him in many ways and in some ways prevent him from litigating his cause that is before this court.
- 3). That the Cook County Jail's law library in division ten is not equipped with the legal materials needed to assist the plaintiff in litigating his cause.
- 4). That the plaintiff is only allowed one, one and a half hour session in the law library per month and this places him at a severe disadvantage and he also requires extra assistance because he has little to no knowledge of the law.
- 5). That the plaintiff is a thirty eight year old african american male that has only a eleventh grade education and is currently and has been for a number of years under a doctor's care for experiencing psychological issues that require him to take medication daily.
- 6). That should this case make it to trial it would likely involve testimony of a conflicting nature, expert witnesses. Having counsel would better enable the plaintiff to present evidence, cross examine witnesses and use investigators which is what the defendants attorneys have at their disposal as well as para legals to do there research.

7). That the plaintiff has made several attempts to obtain legal counsel from the private sector. Attached to this motion are copies of letters that were sent to attorneys in an attempt to procure legal counsel. This will show the court the plaintiff has made every possible attempt there is to try and obtain counsel.

WhereFore, plaintiff request that this Honorable Court in the interest of justice enter an order appointing counsel to represent him in any further proceedings in this civil claim.

RESPECTFULLY , SUBMITTED

 $\label{eq:constraints} \mathcal{L}_{\mathcal{A}} = \{ (a,b,b) \mid a \in \mathbb{R}^{n} \mid a \in \mathbb{R}^{n} \mid a \in \mathbb{R}^{n} \mid a \in \mathbb{R}^{n} \} \}$

Dennie Evel Plumman

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT, ILLINOIS

Dennis Earl Plummer)	Case No: 08C3905
Plaintiff) v.)	The Honorable Judge Pall Meyer
County Of Cook, Mid.) made	
Illinois, et.al)	
Defendants)	

PROOF/CERTIFICATE OF SERVICE

To: United States District Court Office: U.S. Dist. Court Clerk 219 S. Dearborn Street Chicago IL. 60604 To: Cook County States Attorney 500 Richard J. Daley Center Chicago IL. 60602

I, Dennis Earl Plummer, swea	er under penalty of perjury that I served a copy of the
attached document on : U.S.	District Court Clerk and Assistant States Attorney
	. By placing it in the mail at the Cook County
Jail/Corrections on	•

Dennis, Earl Plummer

Signature Of Plaintiff

Dennis Earl Plummer # 20070002702 P.O. Box 089002 Cook County Corrections Chicago IL. 60608